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13
14 UNITED STATES DISTRICT COURT
15 FOR THE DISTRICT OF ARIZONA

16 In Re Bard IVC Filters Products
17 Liability Litigation

18 No. MD-15-02641-PHX-DGC

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28 **CONSENT MOTION TO FILE UNDER
SEAL EXHIBIT A TO PLAINTIFF'S
OPPOSITION TO DEFENDANTS'
MOTION TO EXCLUDE THE TINLIN
CASE-SPECIFIC OPINIONS OF
ROBERT M. MCMEEKING, PH.D.**

In accordance with Section 25 of the Stipulated Protective Order (Doc. 269), Federal Rule of Civil Procedure 26(c)(1)(G), and Local Civil Rule 5.6, Plaintiffs move this Court for an Order sealing Exhibit A to Plaintiff's Opposition to Defendants' Motion to Exclude the Tinlin Case-Specific Opinions of Robert M. McMeeking, Ph.D. This document contains or references information designated as "Confidential Information" under the Stipulated Protective Order.

The parties have met and conferred and agree that Exhibit A to Plaintiff's Opposition to Defendants' Motion to Exclude the Tinlin Case-Specific Opinions of Robert M. McMeeking, Ph.D. should be filed and maintained under seal. Based on the stipulation and the parties' consent to file the documents described above under seal for

1 purposes of consideration of the same, the parties jointly request that the exhibits be
2 sealed.

3 RESPECTFULLY SUBMITTED this 4th day of March, 2019.

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine